

EXHIBIT B

EXHIBIT 47
UNREDACTED VERSION
OF DOCUMENT SOUGHT
TO BE SEALED

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA

3
4 CISCO SYSTEMS, INC.,

5 Plaintiff,

6 vs.

7 ARISTA NETWORKS, INC.,

Case No.

8 Defendant.

5:14-cv-5344-BLF

9
10
11
12 HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

13 SUBJECT TO PROTECTIVE ORDER

14
15 VIDEOTAPED DEPOSITION OF ADAM SWEENEY,

16 VOLUME I

17
18 January 29, 2016

19 9:32 a.m. - 6:48 p.m.

20
21 555 Twin Dolphin Drive, 5th Floor

22 Redwood Shores, California

23 REPORTED BY:

24 James Beasley

25 CSR No. 12807, CCR No. 835, RPR

1 A. I have not read all the standards, but I
2 believe that to be true.

3 Q. And you're not aware of any single IETF
4 document, sitting here today, that mandates a
5 particular type of CLI command syntax for any of the
6 protocols that we've been discussing, true?

7 A. The IETF has published thousands of
8 documents over the years. I really couldn't say
9 what might be in one of them somewhere.

10 Q. All I can ask you is about your knowledge.
11 So I'm just saying, sitting here today,
12 are you aware of any single IETF document that
13 mandates a particular type of CLI command syntax for
14 any of the protocols that we have been discussing
15 today?

16 A. In the tiny, little percentage of those
17 documents that I have read, I am unaware of any such
18 specification.

19 Q. Sitting here today, are you aware of any
20 IEEE documents that mandate a particular type of
21 command syntax for any of the protocols that we have
22 been discussing today?

23 A. The IEEE does -- I don't believe they
24 address any of the protocols we've -- we've been
25 talking about.

1 Q. Sitting here today, are you aware of any
2 type of standard document from any industry standard
3 organization that mandates a particular type of
4 command syntax for a CLI to be used with any of the
5 protocols that we have been discussing today?

6 A. No.

[REDACTED]

[illegible]

A horizontal bar chart consisting of 20 black bars of varying lengths. The bars are arranged vertically, with a thin vertical line to the left of each bar. The lengths of the bars vary significantly, with some being very short and others being nearly full-width.

1 A. It states:

2 "Review in this list gives us a chance
3 to work towards consistency within this
4 very subjective space."

5 Q. And, again, you wrote those words?

6 A. I think so.

7 Q. And you believe that those are true
8 statements?

9 A. Yes.

10 Q. Okay. And when it says: "very subjective
11 space," what is that referring to?

12 A. I assume it means the space of CLI syntax.

13 Q. And you say in the next sentence:

14 "In my opinion..."

15 Can you read that.

16 A. "In my opinion, syntax consistency with
17 features that have similar function is
18 very important."

19 Q. And what did you mean by that statement?

20 A. I meant that -- well, I -- I can only
21 really tell you what I think it means now. I don't
22 know what it meant at the time.

23 Q. All I can ask you is what you can glean
24 from this, sitting here today.

25 What is your understanding of that

1 statement that you wrote in 2004?

2 A. I think it's pointing out that one of the
3 things that makes a set -- a -- a whole set of CLI
4 commands functional is to keep -- keep their
5 structure consistent.

6 Q. Do you recall whether everybody at Cisco
7 had that same belief?

8 MR. FERRALL: Lacks foundation.

9 BY MR. PAK:

10 Q. To your knowledge?

11 MR. FERRALL: Same objection.

12 THE WITNESS: There's absolutely no way I
13 can know what everyone in a 50,000-person company
14 thinks.

15 BY MR. PAK:

16 Q. And isn't it possible that others have --
17 had expressed to you different opinions about how to
18 name CLI syntax?

19 A. Is it possible? I mean, it's possible
20 anyone said anything to me.

21 Q. If somebody said to you, Mr. Sweeney,
22 there's only one way, only one way to express a
23 command syntax for a particular CLI command to be
24 used in a -- network equipment, would you agree with
25 that statement?

1 A. No.

2 Q. And why not?

3 A. 'Cause it's not true.

4 Q. And based on your experience, you know

5 it's not true, true?

6 A. Yes.

7 Q. And you're aware of -- even sitting here
8 today, we've come across different operating
9 systems, different implementations from different
10 companies within the same company where different
11 command line syntax was used for the same
12 functionality, true?

13 MR. FERRALL: Objection. Compound. Vague
14 and ambiguous.

15 THE WITNESS: I guess I'm not sure if
16 we've actually come across anything specific today
17 on this front.

18 BY MR. PAK:

19 Q. You'd agree with me that different
20 operating systems, different implementations from
21 different companies, even different implementations
22 within the same company can have different
23 command-line interface syntax for the same
24 functionality, true?

25 A. I agree.

1 Q. And, for example, we saw differences
2 between -- you were aware of differences between
3 NX-OS and IOS operating systems from Cisco with
4 respect to certain CLI command syntax, true?

5 A. I'm sorry, you kind of reversed your
6 question in the middle there.

7 Q. You were -- you are aware of differences
8 between NX-OS and IOS from Cisco with respect to
9 certain CLI command syntax for the same
10 functionality, true?

11 A. In general, yes.

12 Q. Okay. And generally speaking, you're also
13 aware of certain differences between NextHop and
14 Cisco IOS with respect to certain CLI command syntax
15 for the same functionality, true?

16 A. Yes.

17 Q. Okay. And, sir, at your tenure at Cisco,
18 did you come across any switching equipment where a
19 graphical user interface was used rather than a
20 command-line interface?

21 A. I don't think so.

22 Q. Are you aware of switching equipment that
23 used a graphical user interface to configure and
24 view system settings as opposed to a command-line
25 interface?

[illegible]

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